

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

23ANDME HOLDING CO., *et al.*,

Debtors.

Chapter 11

Case No. 25-40976-357

(Jointly Administered)

Related Docket No. 591

**DECLARATION OF MARYANN LAGURA IN SUPPORT OF OBJECTION OF
CALIFORNIA PHYSICIANS' SERVICE DBA BLUE SHIELD OF CALIFORNIA TO
CURE AMOUNT STATED IN DEBTORS' NOTICE OF (I) POTENTIAL ASSUMPTION
AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED
LEASES AND (II) PROPOSED CURE AMOUNTS [DOCKET NO. 591]**

I, Maryann Lagura, hereby declare as follows:

1. I am a custodian of records in the legal department of California Physicians' Service dba Blue Shield of California ("Blue Shield"). I make this declaration in support of the Objection of California Physicians' Service dba Blue Shield of California to Cure Amount Stated in Debtors' Notice of (I) Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases and (II) Proposed Cure Amounts.¹ I am over 18 years of age and am competent to make this declaration. Unless otherwise indicated, I state the following of my own personal knowledge and if called upon to do so, I could and would competently testify to the matters set forth herein.

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Objection.


2. As a custodian of records of Blue Shield, it is part of my job to review the files of parties who are in default of their obligations under their agreements with Blue Shield, and to work with such parties to resolve the delinquency, or if necessary, to oversee the legal enforcement of the agreements. I am one of the custodians of the books, records and files of Blue Shield, as those books, records and files pertain to the Debtors. I have personally worked on said books, records and files and, as to the following facts, I know them to be true of my own knowledge or have learned them by reference to those business records, which are made and kept by Blue Shield in the ordinary course of its business by Blue Shield personnel with personal knowledge of the events being recorded and a business duty to record such events accurately.

3. Blue Shield is a licensed prepaid health care service plan and, as such, contracts with individuals, associations employer groups and governmental entities to provide or arrange for the provision of covered health services to its members enrolled in its health benefit plans.

4. Blue Shield provides health benefit services to its members and covered dependents employed by 23andMe, Inc. pursuant to those certain Group Health Service Contracts referred to as Blue Shield of California PPO Plan, Blue Shield of California PPO Savings Plan, and Blue Shield of California Access+ HMO Plan (the “Group Benefits Contract”).

5. I have reviewed the Group Benefits Contract designated for assumption by the Debtors in their Cure Notice, as well as the proposed cure amounts. I have also reviewed Blue Shield’s records and the amounts presently due and owing are, at least, \$226,428.75, which represents amounts due and owing for the month of June 2025.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 9th day of June 2025, at Oakland, California.


Maryann Lagura